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## Carter v. SWA and 556

5 messages

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**Adam Greenfield** <agreenfield@candglegal.com>

Mon, May 18, 2020 at 10:17 AM

To: "Matthew B. Gilliam" <mbg@nrtw.org>, "Jeff D. Jennings" <jdj@nrtw.org>

Cc: Ed Cloutman <edcloutman@lawoffices.email>

Matthew-- I see that you decided to move forward and file your motion to compel despite our request for a conference at 1pm today. I presume there is no need for that call at this juncture. Please confirm the call cancellation.

Thanks, Adam Greenfield

Law Offices of Cloutman & Greenfield, PLLC  
3301 Elm Street  
Dallas, TX 75226  
Office: 214-939-9223  
Cell: 214-642-7486

***\*Board Certified Specialist  
in Labor & Employment Law,  
Texas Board of Legal Specialization***

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**Matthew B. Gilliam** <mbg@nrtw.org>

Mon, May 18, 2020 at 12:12 PM

To: Adam Greenfield <agreenfield@candglegal.com>, "Jeff D. Jennings" <jdj@nrtw.org>

Cc: Ed Cloutman <edcloutman@lawoffices.email>

Hi Adam,

We welcome a meeting if it means that you now have responses to our issues with the union's objections and can answer our various questions. However, if you still don't have answers or explanations for us regarding the union's position, I'm not sure how we can make any headway. You already know our issues and questions. We have been trying to resolve them for nearly a year, and tried again in February without any response.

We still do not have the documents that you said were ready last August, or those covered by the November protective order. Nor have you provided us with a valid privilege log. You still have not identified how the documents you produced are responsive to our requests.

Again, if you have responses to the issues we raised, we are free to meet.

Thanks,

Matt

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**Matthew B. Gilliam**

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Staff Attorney (*admitted and licensed to practice only in New York and West Virginia*)

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Ste. 600, Springfield, VA 22160

O: 703-770-3339 F: 703-321-9319

Email: [mbg@nrtw.org](mailto:mbg@nrtw.org) Web: [www.nrtw.org](http://www.nrtw.org)

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**Adam Greenfield** <[agreenfield@candglegal.com](mailto:agreenfield@candglegal.com)>

Mon, May 18, 2020 at 12:51 PM

To: "Matthew B. Gilliam" <[mbg@nrtw.org](mailto:mbg@nrtw.org)>

Cc: Ed Cloutman <[ecloutman@lawoffices.email](mailto:ecloutman@lawoffices.email)>, "Jeff D. Jennings" <[jdj@nrtw.org](mailto:jdj@nrtw.org)>

Matthew— I find your email below to be a bit disingenuous as we have worked through numerous discovery issues and have produced hundreds if not thousands of documents.

Prior to your filing the motion to compel, I expressed that I was on paternity leave at the end of February due to my sons birth on Feb. 25., followed by the closing of our law office in March due to the pandemic. Mr. Cloutman has of course been forced to undertake additional quarantine restrictions since March, per his doctor's orders.

Due to these delays, I expressed that we would be providing the requested information i.e. privilege log, document identification of and documents covered by the protective order by Friday, May 29.

Our office, a shared workspace, reopened today. I will of course work on what was discussed.

What I wanted to do was discuss the outstanding legal issues that we may need to present to the court. I of course will need to review your Motion in order to have a productive conversation with you, so we should cancel our call set for today.

Please confirm that you are free to discuss your motion, as required by Local Rules (before filing), on either Wednesday or Thursday from 1-3pm.

Sincerely, Adam

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**Matthew B. Gilliam** <[mbg@nrtw.org](mailto:mbg@nrtw.org)>

Mon, May 18, 2020 at 4:27 PM

To: Adam Greenfield <[agreenfield@candglegal.com](mailto:agreenfield@candglegal.com)>

Cc: Ed Cloutman <[ecloutman@lawoffices.email](mailto:ecloutman@lawoffices.email)>, "Jeff D. Jennings" <[jdj@nrtw.org](mailto:jdj@nrtw.org)>

Adam,

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**Adam Greenfield** <agreenfield@candglegal.com>

Tue, May 19, 2020 at 3:43 PM

To: "Matthew B. Gilliam" <mbg@nrtw.org>

Cc: Ed Cloutman <ecloutman@lawoffices.email>, "Jeff D. Jennings" <jdj@nrtw.org>

Great, I will call at 2pm. Best, Adam

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